

Comments on the Allied Site cleanup plan

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Kalamazoo River Watershed Council (KRWC)

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Members of the KRWC Board of Directors attended each of the recent public meetings on the Allied Site cleanup. We also invited representatives from Biopath Solutions to explain their ideas at a board meeting.

We feel that the EPA's alternative 2d is an acceptable compromise between the CERCLA guidelines and the community's desire to redevelop part of the site. However for the extra funding needed beyond the \$48 million left in the trust for the Allied Site, we would not support drawing from the other part of the bankruptcy settlement. Those funds are directed to "the dischargability of injunctive environmental obligations at non-debtor-owned property," which refers to the rest of the Superfund Site downstream of the Allied Site. River remediation and restoration in the Kalamazoo River mainstem continue to be hampered by inadequate funding, and those funds would best be applied there, where PCBs continue to be a problem in fish and the people and wildlife that consume them.

Regarding the proposal by Biopath Solutions, naturally we would be enthusiastically supportive of an in-situ process to degrade PCBs in contaminated soils and sediments. Yet we have not been able to learn enough about Biopath's specific methods or past projects to endorse their proposal, nor are we aware of any such approach with a proven track record for a large-scale situation like the Allied Site. As far as we are aware the company has only provided information on one of the 30+ projects where they say have used their technology so far, and that information lacks detail. Perhaps their technology is worthy of support as a pilot study on a laboratory benchtop or small field scale, if it is judged by EPA scientists to show promise, but we would advise against committing to their approach at the present time given the lack of evidence that it would achieve remediation goals.